

NOTICE OF MOTION AND MOTION TO SEAL OR REDACT PERSONAL INFORMATION

Lively v. Wayfarer Studios LLC - Case No. 1:24-cv-10049

Hon. Lewis J. Liman

United States District Judge

U.S. District Court, Southern District of New York

500 Pearl Street, Room 1620

New York, NY 10007

Dear Judge Liman:

PLEASE TAKE NOTICE that Mario Armando Lavandeira, Jr., also known publicly as Perez Hilton, hereby respectfully moves this Court for an order to seal or redact any personal identifying information, including but not limited to my residential address, email address, and phone number, from the public docket and any affidavits, declarations, or documents associated with attempted service of a subpoena or related proceedings in this matter.

This motion is made on the following grounds:

1. I am a public figure with a long-standing and widely recognized online presence and media platform.
2. The disclosure of my residential address poses a real and immediate threat to my personal safety and the safety of my family.
3. A review of the Court's public docket shows that, on July 18, 2025, Plaintiff's counsel submitted identifying information for a third party, Cynthia Barnes Slater, who had not yet been successfully served. Despite being a private individual and not a public figure, her information was made public, exposing her to possible harassment or worse.

4. As someone with international name recognition and a significant online following, I am at an increased risk of being targeted by individuals who may exploit this information. This endangers not only myself, but also my minor children and elderly mother, who reside with me.

5. In good faith, I directly communicated with Plaintiff's counsel and offered to accept service via email, thereby eliminating the need to publicly disclose my physical address.

6. My residential address, email, and phone number are not publicly available, and as a non-party to this litigation, there is no compelling public interest in disclosing these details.

This request is narrowly tailored to protect my privacy and ensure the physical safety of my family, without impeding the Plaintiff's ability to pursue legitimate litigation objectives. I respectfully request that the Court grant this Motion to Seal or Redact Personal Information in all relevant and future filings.

As Ms. Lively herself has publicly emphasized the importance of motherhood and protecting children, I thank her and the Court in advance for considering this motion from one concerned parent to another.

Respectfully submitted,

Mario Armando Lavandeira, Jr.

Pro Se

Dated: July 19, 2025